

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Atlantic Mutual Insurance Company,  
  
Plaintiff,

CIVIL ACTION NO. 07cv2910 (JGK)

v.

Universal Underwriters Insurance  
Company,

Defendant.

**MOTION FOR ADMISSION PRO HAC VICE**

Defendant, Universal Underwriters Insurance Company, by and through their attorney, Cartafalsa, Slattery, Turpin & Lenoff, hereby move this Court for Admission for Pro Hac Vice of Robert E. Dapper, Jr. and Douglas J. Stipanovich, and in support of its Motion, set forth the following:

1. Local Rule 1.3(c) of the District Court of the Southern District of New York provides for the Admission Pro Hac Vice of a member in good standing in the bar of any state or of any United States District Court to be permitted to argue or try a particular case in whole or in part as counsel or advocate upon motion to the court.

2. Robert E. Dapper, Jr. is a shareholder of the law firm of Dapper, Baldasare, Benson, Behling & Kane, P.C., 444 Liberty Avenue, Suite 1000, Pittsburgh, Pennsylvania 15222.

3. Douglas J. Stipanovich is an associate of the law firm of Dapper, Baldasare, Benson, Behling & Kane, P.C., 444 Liberty Avenue, Suite 1000, Pittsburgh, Pennsylvania 15222.

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4. Robert E. Dapper, Jr. is an attorney admitted to practice law in the Commonwealth of Pennsylvania and is a member in good standing to practice in the Supreme Court of Pennsylvania. (Attached at Exhibit A is Mr. Dapper's Certificate of Good Standing for the Commonwealth of Pennsylvania.)

5. Attorney Dapper is also admitted to practice in the West Virginia Supreme Court, the District Court for the Western District of Pennsylvania, the District Court for the Middle District of Pennsylvania, the District Court for the Northern District of West Virginia, the District Court for the Southern District of West Virginia, the Third Circuit Court of Appeals, and the United States Supreme Court. He is in good standing of all the bars of all of the above-mentioned courts. (Attached at Exhibit B is Mr. Dapper's Certificate of Good Standing for the State of West Virginia.)

6. Attorney Stipanovich is admitted to practice law in the Commonwealth of Pennsylvania and is a member in good standing to practice in the Supreme Court of Pennsylvania. (Attached at Exhibit C is Mr. Stipanovich's Certificate of Good Standing.)

7. Attorney Stipanovich is also admitted to practice law in the District Court for the Western District of Pennsylvania and is a member in good standing of that bar.

8. Attorney Dapper has never been censured, suspended, disbarred or otherwise disciplined by any court, nor has he been held in contempt of court.

9. Attorney Stipanovich has never been censured, suspended, disbarred or otherwise disciplined by any court, nor has he been held in contempt of court.

10. Universal Underwriters Insurance Company wishes to be represented by Attorneys Dapper and Stipanovich in this matter.

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11. Attorneys Dapper and Stipanovich agree to abide by all rules and requirements pertaining to the proceedings before this Court, including the local rules of the U.S. District Court for the Southern District of New York.

WHEREFORE, the undersigned counsel, on behalf of Universal Underwriters Insurance Company, moves the Court to enter an Order admitting Robert E. Dapper, Jr. and Douglas J. Stipanovich *pro hac vice*, to appear on behalf of Defendants in the above-captioned matter.

Respectfully submitted,

Respectfully submitted,

CARTAFALSA, SLATTERY, TURPIN &  
LENOFF

/s/ Clara Villarreal

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